



PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Industrial and Commercial Bank of China USA, National Association
Charter Number 24440

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New York, NY 10173

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International Banking Supervision
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **Industrial and Commercial Bank of China USA, National Association** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Industrial and Commercial Bank of China USA, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

**The Lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.*

The major factors that support this rating include:

- The bank’s lending activity is adequate given the deposit market share, lending market share, and competitive market environments.
- The geographic dispersion of home mortgage loans is adequate in California and excellent in New York.
- The borrower distribution of home mortgage loans by income level is adequate in California and poor in New York.
- Community development (CD) lending had a positive impact on the Lending Test, ranging from significantly positive to positive in the rating areas.
- The bank had an overall good level of qualified investments, ranging from good to adequate. Investments were responsive to community needs, specifically the need for affordable housing and financial literacy.
- The branch distribution is reasonably accessible to essentially all portions of low- and moderate-income individuals and geographies.
- The bank provides an adequate level of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

Industrial and Commercial Bank of China USA, National Association (ICBC USA) is an interstate financial institution headquartered in New York, New York. ICBC USA is a majority-owned subsidiary of Industrial and Commercial Bank of China (ICBC), headquartered in Beijing, China. ICBC is one of China's "Big Four" banks and the largest bank in China by asset size. ICBC USA conducts business in New York and California. As of June 30, 2017, ICBC USA had total assets of \$2.14 billion, total loans of \$1.85 billion, and Tier One capital of \$274.22 million.

According to the FDIC Market Share Report dated June 30, 2016, ICBC USA had deposits of \$1.62 billion. The bank operates three branches in New York City, five branches in the greater Los Angeles area, and five branches in the greater San Francisco area. The bank owns and operates 11 deposit-taking ATMs (three in New York, five in Los Angeles, and three in San Francisco). ICBC USA provides retail and commercial banking and trade finance services, offering a range of products to meet both consumer and commercial banking needs. There were no branches opened or closed during our review period.

ICBC USA's strategy is focused on supporting local economic development through deposit generation and loan growth. The bank's primary focus is commercial real estate lending, supported by modest organic deposit growth and wholesale funding. As of June 30, 2017, the bank had loans of \$1.85 billion, representing 86.7 percent of total assets. Approximately 75.2 percent of the bank's loan portfolio was comprised of real estate loans, of which commercial real estate (47.3 percent) represented the predominant portion. Commercial and industrial loans represented 18.9 percent of the total loan portfolio, and financial institution loans comprised another 5.9 percent.

Competition is strong in the bank's Assessment Areas (AAs) with numerous local, regional, and national banks, as well as credit unions, mortgage companies, and non-bank lenders. National banks including J.P. Morgan Chase Bank, Bank of America, and Wells Fargo Bank compete for CD and lending opportunities in the AAs.

There have been no merger or acquisition activities affecting the bank's CRA performance since the last evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities. The bank received an Outstanding rating in its previous CRA evaluation dated November 18, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses ICBC USA's performance under the Lending, Investment, and Service Tests. The evaluation period for the Lending Test is January 1, 2014 to December 31, 2016, with the exception of CD loans. For the Investment Test, Service Test, and CD loans, the evaluation period is November 13, 2013 to August 21, 2017.

We evaluated the bank's lending performance using home mortgage loans reported under the HMDA, loans to small businesses reported under the CRA, multifamily loans, and CD loans. Given the relatively low volume of home mortgage loans, we aggregated home purchase, home improvement, and home refinance loans within each AA instead of analyzing them separately. This approach allowed for a more accurate conclusion with regard to the Lending Test. Loans to small farms reported under the CRA were not evaluated as there were no originations during the evaluation period.

We evaluated the bank's investment performance by reviewing all qualified investments made during the evaluation period. We based our conclusions on the number and dollar amount of investment as well as the level of innovativeness and complexity.

We compared the bank's loan data to area demographic data using the 2010 U.S. Census American Community Survey, 2016 Dun and Bradstreet small business demographic data, 2015 HMDA peer mortgage data, 2015 CRA peer small business data, and 2016 FFIEC median family incomes. Deposit and branch data was obtained from the Federal Deposit Insurance Corporation.

Data Integrity

This evaluation is based on accurate data. We tested the accuracy of the bank's HMDA and CRA data collection, verification, and reporting processes to assess the reliability of bank-provided HMDA and CRA data. We also reviewed CRA data to determine whether CD loans, investments, and services are eligible for consideration under the CRA. The bank's processes for collecting, verifying, and reporting HMDA data are adequate. Our testing did not reveal any data errors in key fields. Based on our transactional testing, the HMDA and CRA data are reliable.

Selection of Areas for Full-Scope Review

ICBC USA has delineated three AAs in California and one in New York that meet the technical and regulatory requirements as defined by the regulation. We selected all four AAs for full scope reviews. The AAs are consistent with the requirements of the regulation, and do not arbitrarily exclude low- or moderate-income geographies. For additional information, refer to Appendix A.

Ratings

The bank's overall rating is a blend of the state ratings. The bank's rating is based on the Lending Test, Investment Test, and Services Test, with the Lending Test receiving more weight than the Investment or Service Tests. The state of California and state of New York carried equal weights in our conclusions based on similar deposit concentrations. As of June 30, 2016, 52.7 percent and 47.3 percent of deposits were in California and New York, respectively.

Performance related to home mortgage lending is also more heavily weighted than performance related to small business loans. The volume of home mortgage originations was significantly larger than the volume of small business loans in all markets. We placed more weight on performance against aggregate peer performance than on performance based on market share among specific loan types. Market share data is based on the bank's performance within a single year while performance compared to aggregate peer data considers all loans originated during the evaluation period.

Inside/Outside Ratio

This ratio is a bank-wide calculation and is not calculated by individual rating area or AA. The analysis is limited to bank originations and purchases and does not include any affiliate data. We did not place a significant amount of emphasis on the inside/outside ratio, as it does not include an analysis of the bank's primary lending product, commercial real estate mortgages. For the two-year evaluation period, ICBC USA originated a majority of home mortgage and small business loans outside of its AAs (79.44 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home purchase loans (20.20 percent), home refinance loans (23.85 percent), home improvement loans (25.00 percent), and small business loans (12.72 percent).

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of California

CRA rating for California:	Low Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	Low Satisfactory

The major factors that support this rating include the following:

- Lending activities in the Los Angeles and San Francisco AAs are adequate. Lending activities in the Oakland AA are good.
- Overall, CD lending had a positive impact on lending performance in California.
- CD lending was significantly positive in the Oakland and San Francisco AAs.
- Investment performance is adequate when considering performance in all California AAs.
- The branch distribution is reasonably accessible to low- and moderate-income (LMI) individuals and geographies.
- An adequate level of CD services is responsive to community needs.

Description of Institution's Operations in California

Refer to the market profiles for the state of California in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

ICBC USA has three AAs within the state of California. These AAs include Los Angeles, Oakland, and San Francisco. The Los Angeles AA consists of Los Angeles County, and the Oakland AA consists of Alameda County. The San Francisco AA consists of San Francisco and San Mateo Counties. The AAs consist of whole counties. The bank operates five branches in the Los Angeles AA, one branch in the Oakland AA, and four branches in the San Francisco AA.

ICBC USA provides a full range of loan and deposit products to all AAs, including personal and business retail banking and lending products. ICBC USA has ten branches within the state, representing 77 percent of the total branch network. There were no branch openings or closings during the evaluation period. ICBC USA has eight deposit-taking ATMs within the state, representing 73 percent of the total ATM network. As of June 30, 2016, the bank ranked 74th in deposits among 226 institutions, representing 0.07 percent of the statewide market share. ICBC USA's statewide deposits totaled \$855.9 million. The Los Angeles AA is the bank's most significant AA in the state, accounting for 50.8 percent of total deposits in California. The banking industry is highly competitive in the AA's and includes branches of national, regional, and local community banks, credit unions, and other non-bank financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN California

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the state of California is rated Low Satisfactory. Based on full-scope reviews, the bank's performance is adequate in the Los Angeles AA, good in the Oakland AA, and adequate in the San Francisco AA.

Lending Activity

ICBC USA's lending levels reflect adequate responsiveness to the overall AA credit needs. Refer to Table 1 Lending Volume in the state of California section of appendix D for the facts and data used to evaluate the bank's lending activity.

Los Angeles AA

ICBC USA's lending activity in the Los Angeles AA is poor when comparing the bank's deposit market share to the lending market share within each product type. As of June 30, 2016, the bank held 0.11 percent market share of deposits and was ranked 48 out of 108 depository financial institutions in the AA. The market share rank in home mortgage lending relative to the number of reporting lenders in the AA is below the bank's market rank in deposits. ICBC held a 0.01 percent market share for home purchase loans overall and was ranked 363 out of 701 total reporting lenders. ICBC USA's market share for multifamily loans is 0.04 percent and ranked 92 out of 104 reporting lenders. The bank did not have a lending market share in home improvement or home refinance products.

Oakland AA

ICBC USA's lending activity in the Oakland AA is adequate. The deposit market share at June 30, 2016, was 0.16 percent, and the bank was ranked 32nd out of 42 depository institutions. The bank's market share rank in home mortgage lending relative to the number of reporting lenders in the AA is below the bank's market rank in deposits. ICBC USA held a 0.01 percent market share for home refinance loans, and was ranked 354 out of 541 total reporting lenders. However, ICBC USA's market share for multifamily loans is favorable at 0.12 percent and they are ranked 54 out of 62 reporting lenders. The bank did not have a lending market share in home purchase or home improvement products.

San Francisco AA

The bank's lending activity in the San Francisco AA is good. As of June 30, 2016, the bank held 0.15 percent market share of deposits and was ranked 21 out of 51 depository financial institutions in the AA. ICBC USA's market share rank in home mortgage lending relative to the

number of reporting lenders in the AA is favorable to the bank's market rank in deposits. ICBC USA held a 0.06 percent market share for home purchase loans and was ranked 128 out of 360 total reporting lenders. ICBC USA's market share for multifamily loans is 0.20 percent and they are ranked 48 out of 68 reporting lenders. The bank did not have a lending market share in home improvement or home refinance products.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflects adequate penetration throughout the full-scope AAs. The geographic distribution of home mortgage and multifamily loans is adequate. The geographic distribution of the three loans to small businesses is good. The bank did not originate any small farm loans.

Refer to Tables 2, 3, 4, and 5 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage and multifamily lending.

Refer to Table 6 of Appendix D for the state of California for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

Los Angeles

Home Purchase, Home Improvement, and Home Mortgage Refinance

The overall geographic distribution of loans reflects good penetration throughout the AA to low- and moderate-income geographies. Overall, this performance is considered good when considering that the Adjusted Median Family Income for 2016 in this AA is \$62,400, which means a low-income individual earns \$31,200 or less while a moderate-income individual earns less than \$49,900, and the median cost of housing is \$526,439. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 14 percent of the population of this AA is below the poverty level.

The bank did not originate any loans in low-income geographies. However, the percentage of loans in moderate-income geographies was good and was near to the percentage of owner occupied units in these geographies.

Multifamily Lending

There were not enough multifamily loans originated during the evaluation period to allow for a meaningful analysis. However, the geographic distribution of the limited number of multifamily loans reflects good penetration throughout the AA. The bank did not originate any multifamily loans in low-income geographies. The percentage of loans in moderate-income geographies exceeds the percentage of multifamily units in those geographies.

Oakland AA

Home Purchase, Home Improvement, and Home Mortgage Refinance

The geographic distribution of loans reflects excellent penetration throughout the AA to low- and moderate-income geographies. Overall, this performance is considered excellent when considering that the Adjusted Median Family Income for 2016 in this AA is \$93,600, which means a low-income individual earns less than \$46,800 while a moderate-income individual earns less than \$74,880, and the median cost of housing is \$551,319. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 10 percent of the population of this AA is below the poverty level.

The percentage of loans in low- and moderate-income geographies significantly exceeded the percentage of owner-occupied units in these geographies.

Multifamily Lending

There were not enough multifamily loans originated during the evaluation period to allow for a meaningful analysis. However, the geographic distribution of the limited number of multifamily loans reflects excellent penetration throughout the AA. The percentage of loans in low-income geographies was marginally below the percentage of multifamily units in those geographies. The percentage of loans in moderate-income geographies significantly exceeds the percentage of multifamily units in those geographies.

San Francisco AA

Home Purchase, Home Improvement, and Home Mortgage Refinance

The overall geographic distribution of loans reflects poor penetration throughout the AA to low- and moderate-income geographies. Overall, this performance is considered poor. It is important to note that Adjusted Median Family Income for 2016 in this AA is \$104,700, which means a low-income individual earns less than \$52,350 while a moderate-income individual earns less than \$83,760, and the median cost of housing is \$769,464. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, nine percent of the population of this AA is below the poverty level.

There were no loans made in low-income geographies. The portion of loans made in moderate-income geographies was below the percentage of owner-occupied units in these geographies.

Multifamily Lending

There were not enough multifamily loans originated during the evaluation period to allow for a meaningful analysis. However, the geographic distribution of the limited number of multifamily loans reflects excellent penetration throughout the AA. The percentage of loans in low-income geographies was marginally below the percentage of multifamily units in those geographies. The percentage of loans in moderate-income geographies exceeds the percentage of multifamily units in those geographies.

Small Loans to Businesses

There were not enough small business loans originated during the evaluation period to allow for a meaningful analysis. It is noteworthy, however, that all three small business loans were made in moderate-income geographies.

Lending Gap Analysis

The lending distribution in the AA was evaluated to determine if any unexplained, conspicuous gaps existed. Maps and reports on HMDA and CRA loan data were compared to the geographies where loans were originated to the geographies in the AA. We also considered competition, market conditions, and demographic information. Based upon the business strategy of the institution and the data in our analysis and reviews, we concluded that there were no conspicuous gaps identified within the AAs.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of loans to borrowers in the AAs reflects adequate penetration among customers of different income levels. The distribution of loans by income level of borrower for home mortgage loans is adequate and for the few small businesses, good. The bank did not originate any small farm loans.

Refer to Tables 8, 9 and 10 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage lending.

Refer to Table 11 of Appendix D in the state of California for the facts and data used to evaluate the bank's distribution of loans to businesses of different sizes.

Los Angeles AA

Home Purchase, Home Improvement, and Home Mortgage Refinance

The overall distribution of loans to borrowers of different income levels in this AA is poor. It is important to note that Adjusted Median Family Income for 2016 in this AA is \$62,400, which means a low-income individual earns less than \$31,200 while a moderate-income individual earns less than \$49,900, and the median cost of housing is \$526,439. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 14 percent of the population of this AA is below the poverty level.

The percentage of home mortgage loans to low- and moderate-income borrowers was well below the percentage of low- and moderate-income families in the AA.

Oakland AA

Home Purchase, Home Improvement, and Home Mortgage Refinance

The overall distribution of loans to borrowers of different income levels is excellent. Overall, this performance is considered excellent when considering that the Adjusted Median Family

Income for 2016 in this AA is \$93,600, which means a low-income individual earns less than \$46,800 while a moderate- income individual earns less than \$74,880, and the median cost of housing is \$551,319. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 10 percent of the population of this AA is below the poverty level.

The percentage of home mortgage loans to low- and moderate-income borrowers within the AA exceeded the percentage of low- and moderate income families in the AA.

San Francisco AA

Home Purchase, Home Improvement, and Home Mortgage Refinance

The overall distribution of loans to borrowers of different income levels is poor. Overall, this performance is considered poor. It is important to note that Adjusted Median Family Income for 2016 in this AA is \$104,700, which means a low-income individual earns less than \$52,350 while a moderate- income individual earns less than \$83,760, and the median cost of housing is \$769,464. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, nine percent of the population of this AA is below the poverty level.

The percentage of home mortgage loans to low-income borrowers within the AA was well below the percentage of low-income families in the AA. There were no loans made to moderate income borrowers within the AA.

Small Loans to Businesses

There were not enough small business loans originated in the AAs during the evaluation period to allow for a meaningful analysis. It is noteworthy, however, that two of the three small business loans originated were to businesses with revenues under \$1 million.

Community Development Lending

Refer to Table 1 Lending Volume in the state of California section of appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Los Angeles AA

CD lending had a neutral impact on overall lending performance in the Los Angeles AA. ICBC USA originated one CD loan of \$1.50 million in the AA during the evaluation period. This volume represents 2.04 percent of allocated Tier One capital. The volume of CD lending during the three-year evaluation period reflects adequate responsiveness and has a neutral impact on the overall Lending Test performance. The loan promoted the economic development needs of the area and was originated using the U.S. Small Business Administration's 504-loan program. The loan assisted in providing new medical facilities that serve the entire county, including LMI residents.

Oakland AA

CD lending had a significantly positive impact on overall lending performance in the Oakland AA. ICBC USA originated three qualified CD loans totaling \$2.25 million in the AA during the evaluation period. This volume represents 19.58 percent of allocated tier 1 capital. These identified loans addressed needs in the AA for affordable housing services, reflecting excellent responsiveness. These loans are to borrowers who provide affordable housing in multifamily rental properties that serve LMI individuals.

San Francisco AA

CD lending had a significantly positive impact on overall lending performance in the San Francisco AA. ICBC USA originated six qualified CD loans totaling \$7.92 million in the AA during the evaluation period. This volume represents 13.28 percent of allocated tier 1 capital. These identified loans addressed the needs in the AA for affordable housing services, reflecting excellent responsiveness. These loans are to borrowers who provide affordable housing in multifamily rental properties that serve low- to moderate-income individuals.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in California is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Los Angeles AA is adequate, and in the Oakland AA, excellent. In the San Francisco AA, the bank's performance is poor.

Refer to Table 14 in the state of California section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Los Angeles AA

During the evaluation period, ICBC USA purchased 24 investments benefiting the AA that totaled \$853,637. The investments consisted of five mortgage-backed securities totaling \$843,637 and 19 donations and grants totaling over \$10,000. This is an adequate level of investments and represented 1.12 percent of tier 1 capital allocated to the AA.

ICBC USA donated \$2,000 to a nonprofit organization, Chinatown Service Center, which provides affordable housing and community services to LMI individuals and communities. The bank also donated \$1,000 and \$2000, respectively, to the Girl Scouts of Greater Los Angeles and Los Angeles Area Council of Boy Scouts. These organizations provide community services, economic development, and education to at-risk boys and girls within the LMI community. ICBC USA donated \$2,000 to the Los Angeles Mission, an organization that supports community development by providing services to homeless individuals, including a soup kitchen and drug addiction assistance.

Funding for affordable housing, financial literacy, and banks to involve their executive management in the community were some of the main identified CD needs in the AA.

Oakland AA

During the evaluation period, ICBC USA originated five investments in the AA totaling \$718,720. This consisted of two mortgage-backed security investments totaling \$716,220 and three donations and grants totaling \$2,500. This is an excellent level of investments and represented 6.04 percent of allocated tier 1 capital. The bank's responsiveness to CD needs in the AA is excellent.

ICBC USA donated \$2,000 to one nonprofit organization, Asian Health Services, which provides health services and revitalization and stabilization activities to LMI individuals and communities, and \$500 to the Family Bridge Inc., which provides childcare services and health care services to LMI individuals.

Identified CD needs in the area include funding for local community development projects, affordable housing (rental), and micro lending programs. Additional needs include financial literacy training for both refugees and small businesses and increased small business lending.

San Francisco AA

During the evaluation period, ICBC USA made 19 investments in the San Francisco AA totaling \$22,455. This dollar amount represents 0.04 percent of allocated tier 1 capital for the AA and was considered poor. The bank did not purchase qualified securities with an LMI beneficiary located in the San Francisco MSA.

ICBC donated \$3,700 to Gum Moon Women's Residence, a non-profit organization that provides housing and economic development to LMI individuals and communities. The bank donated \$4,000 to the Community Youth Center of San Francisco, an organization that provides community services and mental health outreach to LMI communities, and \$4,500 to the National Asian American Coalition, providing affordable housing and small business services to LMI individuals.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in California is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Los Angeles, Oakland, and San Francisco AAs is adequate.

Retail Banking Services

Refer to Table 15 in the state of California section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Los Angeles AA

ICBC USA's branch distribution in the AA is adequate. Branches are reasonably accessible to essentially all portions of geographies and individuals of different income levels in the AA. There

were no branches in low-income areas, and two branches in a moderate-income tract. The percentage of the bank's branches in moderate-income tracts exceeds the percentage of the population within moderate-income tracts.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. There have been no branch openings or closings since 2013 in this AA. Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography. Bank management complements its traditional service delivery methods with certain alternative delivery systems such as online banking and automated teller machines (ATMs).

Oakland AA

ICBC USA's branch distribution in the AA is adequate. The branch is reasonably accessible to essentially all portions of geographies and individuals of different income levels in the AA. ICBC USA has one branch in the AA that is located in a low-income area and no branches in moderate-income areas. The percentage of the institution's branches located in low-and moderate income areas exceeds and are significantly below, respectively, the percentages of population living in those areas.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. There have been no branch openings or closings since 2013 in this AA. Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations, regardless of the income level of the geography. Bank management complements its traditional service delivery methods with certain alternative delivery systems such as online banking and ATMs.

San Francisco AA

ICBC USA's branch distribution in the AA is adequate. Branches are reasonably accessible to essentially all portions of geographies and individuals of different income levels in the AA. ICBC had three branches in low-income areas, no branches in moderate-income tracts, and one branch in a middle-income tract. The percentage of the institution's branches located in low-income tracts exceeds the percentage of the low-income population in those tracts. The percentage of branches in moderate-income tracts is significantly below the percentage of population in moderate-income tracts.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. There have been no branch openings or closings since 2013 in this AA. Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations, regardless of the income level of the geography. Bank management complements its traditional service delivery methods with certain alternative delivery processes such as online banking and ATMs.

Community Development Services

Los Angeles AA

ICBC USA's performance in providing CD services in the Los Angeles AA is adequate. Twelve bank employees provided their expertise to four different CD organizations for a total of 12 hours throughout the evaluation period. This represents an adequate level of activities and responsiveness to the financial literacy needs of the community. Many of the services focused on financial literacy among the elderly. Employees gave presentations on topics such as home ownership, balancing and maintaining a checkbook, as well as fraud prevention.

Oakland AA

In the Oakland AA, five employees provided their expertise to three different organizations for a total of seven hours throughout the evaluation period. This represents a poor level of activities and responsiveness to the financial literacy needs of the community. Many of the services focused on financial literacy among the elderly. Employees gave presentations on topics such as home ownership, balancing and maintaining a checkbook, as well as fraud prevention.

San Francisco AA

In the San Francisco AA, seven employees provided their expertise to four different organizations for a total of 102 hours throughout the evaluation period. This represents a good level of activities and responsiveness to the financial literacy needs of the community. Many of the services focused on financial literacy. Employees gave presentations on topics such as financial education and fraud prevention among low- and moderate-income individuals, most of whom are recent immigrants to the United States. Other services include fund raising activities for low-income and homeless women alongside a local community organization.

State Rating

State of New York

CRA Rating for New York:	Low Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Needs to Improve
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- The bank's overall lending activity is adequate.
- The overall geographic distribution of the institution's loans is excellent. Excellent home mortgage performance significantly contributed to this conclusion.
- The overall distribution of loans to borrowers of different income levels is poor as evidenced by poor home mortgage lending to low- and moderate-income borrowers.
- CD lending is excellent. CD lending had a significantly positive impact on the bank's lending performance and demonstrated good responsiveness.
- Overall investment performance is poor.
- An adequate level of CD services is responsive to community needs.

Description of Institution's Operations in New York

Refer to the market profiles for the state of New York in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

ICBC USA has one AA in the state of New York. The New York AA consists of Kings, New York, and Queens Counties. The AA consists of whole counties, complies with legal requirements of CRA, and does not arbitrarily exclude low- and moderate-income areas. The bank operates three branches in the New York AA.

ICBC-USA provides a full range of loan and deposit products to all AAs including personal and business retail banking and lending products. ICBC-USA has three branches within the state, representing 23 percent of the bank's total branch network. There were no branch openings or closings in the state during the evaluation period. ICBC USA has three deposit-taking ATMs within the state, representing 27 percent of the bank's total deposit-taking ATM network. The bank is part of the Allpoint and STARsf surcharge-free ATM network, providing customers' access to more than 60,000 ATMs worldwide and 50,000 ATMs in the US. As of June 30, 2016, the bank ranked 73rd in the state in deposits among 212 institutions, with a 0.05 percent market share. Statewide deposits totaled \$767.8 million. The banking industry is highly competitive in the AA's and includes branches of national, regional, and local community banks, credit unions, and other non-bank financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN New York

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New York is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the New York AA is adequate.

Lending Activity

ICBC USA's lending levels reflect adequate responsiveness to overall credit needs. Refer to Table 1, "Lending Volume in the State of New York," in Appendix D for the facts and data used to evaluate the bank's lending activity.

New York AA

ICBC USA's lending activity in the New York AA is adequate. As of June 30, 2016, the bank held 0.07 percent market share of deposits and was ranked 47 out of 107 depository financial institutions in the AA. ICBC USA held a 0.02 percent market share for home purchase loans overall and was ranked 186 out of 376 total reporting lenders. The bank held a 0.02 percent market share for home improvement loans and was ranked 164 out of 192 lenders. The bank was ranked 206 out of 402 lenders in the home refinance market, and held 0.02 percent of the market share. ICBC USA's market share for multifamily loans is 0.17 percent and ranked 71 out of 143 reporting lenders.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflects excellent penetration throughout the full-scope AAs. The geographic distribution of home mortgage and multifamily loans is excellent. The geographic distribution of the two loans to small businesses is good. The bank did not originate any small farm loans.

Refer to Tables 2, 3, 4, and 5 in the State of New York section of Appendix D for the facts and data used to evaluate the geographic dispersion of the bank's home mortgage and multifamily loans.

Refer to Table 6 of Appendix D for the state of New York for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

New York AA

Home Purchase, Home Improvement, and Home Mortgage Refinance

The overall geographic distribution of loans in this AA reflects excellent penetration throughout the AA to low- and moderate-income geographies. Overall, this performance is considered

excellent when considering that the Adjusted Median Family Income for 2016 in this AA is \$72,600, which means a low-income individual earns \$36,300 or less while a moderate-income individual earns less than \$58,080, and the median cost of housing is \$571,093. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 17 percent of the population of this AA is below the poverty level.

The percentage of loans in low-income and moderate-income geographies is excellent and significantly exceeds the percentage of owner occupied units in these geographies.

Multifamily Lending

There were not enough multifamily loans originated during the evaluation period to allow for a meaningful analysis. However, the geographic distribution of the limited number of multifamily loans reflects excellent penetration throughout the AA. The percentage of loans in low- and moderate-income geographies significantly exceeds the percentage of owner occupied units in these geographies.

Small Loans to Businesses

There were not enough small business loans originated during the evaluation period to allow for a meaningful analysis. It is noteworthy, however, that one of the two small business loans originated was made in a moderate-income geography.

Lending Gap Analysis

We analyzed reports of areas with no lending activity and reviewed maps of activities within the AA. Based upon the business strategy of the institution and the data in our analysis and reviews, we concluded that there were no conspicuous gaps identified within the AAs.

Distribution of Loans by Income Level of the Borrower

The overall distribution of lending by income level of borrower is poor. The distribution of the few loans to small businesses is good. The bank did not originate any small farm loans.

Refer to Tables 8, 9, and 10 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan originations and purchases.

Refer to Table 11 of Appendix D in the state of California for the facts and data used to evaluate the bank's distribution of loans to businesses of different sizes.

New York AA

Home Purchase, Home Improvement, and Home Mortgage Refinance

The overall distribution of loans to borrowers of different income levels is poor. Overall, this performance is considered poor. It is important to note that Adjusted Median Family Income for 2016 in this AA is \$72,600, which means a low-income individual earns

\$36,300 or less while a moderate-income individual earns less than \$58,080, and the median cost of housing is \$571,093. These demographics make home ownership difficult for low- or moderate-income individuals. In addition, 17 percent of the population of this AA is below the poverty level.

The percentage of loans to low- and moderate-income borrowers is well below the percentage of low- and moderate-income families in the AA.

Small Loans to Businesses

There were not enough small business loans originated during the evaluation period to allow for a meaningful analysis. It is noteworthy, however, that both small business loans originated were to businesses with revenues under \$1 million.

Community Development Lending

New York AA

Refer to Table 1, “Lending Volume in the State of New York” section of Appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. However, Table 5 does not list CD loans separately.

The bank’s level of CD lending is excellent and has a significantly positive impact on overall lending performance in the New York AA. ICBC USA originated six qualified CD loans totaling \$22.94 million in the AA during the evaluation period. This volume represents 17.69 percent of allocated tier 1 capital. These identified loans addressed the needs in the AA of affordable housing services, reflecting excellent responsiveness. These loans are to borrowers who provide affordable housing in multifamily rental properties that serve LMI persons.

One loan of \$1.35 million addressed an essential community need by lending to a facility to house a public benefit medical facility located in a moderate-income area that serves the entire county. In addition, one loan of \$1.8 million addressed a community need in the AA. The loan is to a facility to house an adult daycare center. The center’s clients are low-and-moderate income patients who are qualified for Medicaid and who participate in center activities. The center provides social and recreational activities, meals, health support services, and transportation to and from the center.

One loan for \$17.10 million addressed the need to revitalize or stabilize an LMI geography by lending to a supermarket being renovated that is located in a redevelopment and revitalization area identified by the city. This is the largest supermarket within the area, accepts food stamps from local residents, and provides affordable supermarket options to the area residents.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in New York is rated Needs to Improve. Based on a full-scope review, the bank's performance in the New York AA is poor.

Refer to Table 14 in the State of New York section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

New York AA

During the evaluation period, ICBC USA made 20 investments in the New York AA totaling \$47,809. This dollar amount represents 0.04 percent of allocated tier 1 capital for the AA, and was considered poor. All of the investments were donations that benefited LMI individuals. ICBC USA donated \$12,309 to Asian Americans for Equality, a nonprofit organization that provides affordable housing and after school program to LMI individuals. The bank made a \$13,500 investment to the Chinatown Partnership LDC that provides community services, revitalization, and stabilization to LMI communities. A \$12,000 investment was made to the Chinese American Planning Council, an organization that provides community services and mental health outreach to LMI communities.

Funding for affordable housing, community services, economic development, and childcare were some of the main identified CD needs in the AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in New York is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the New York AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of New York section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

New York AA

ICBC USA's branch distribution in the AA from 2014 through 2016 was excellent. Branches were readily accessible to all portions of geographies and individuals of different income levels in the AA. ICBC USA had two branches in low-income areas and one branch in a moderate-income area. The percentage of branches in low-income tracts exceeds the percentage of population living in those tracts. The percentage of bank branches in moderate-income tracts approximates the percentage of population living in moderate-income tracts. Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. There have been no branch openings or closings since 2013 in this AA.

Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. ICBC USA branches in the AA are open on both Saturday and Sunday to further benefit individuals of all income levels. Services offered and banking hours are comparable among locations regardless of the income level of the geography. Bank management complements its traditional service delivery methods with certain alternative delivery systems such as online banking and ATMs.

Community Development Services

New York AA

In the New York AA, nine ICBC USA employees provided expertise to four different community development organizations for a total of nine hours throughout the evaluation period. This represents an adequate level of activities and responsiveness to the financial literacy needs of the community. All services focused on financial literacy. Employees conducted presentations on topics such as “Financial Tips for Seniors,” which covered credit card counseling, how to review monthly bank statements for suspicious activities, and how to be conscious of unsolicited emails and phone calls from marketers. Another presentation addressed financial exploitation of the elderly, which encompassed identity theft and sweepstakes-related fraud.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/14 to 12/31/16 Investment and Service Tests and CD Loans: 11/13/13 to 08/21/17	
Financial Institution Industrial and Commercial Bank of China USA, National Association (ICBC USA) New York, NY	Products Reviewed Home Purchase , Home Improvement, and Home Refinance Loans, Community Development Loans, Qualified Investments, and Services loans, investments, services, donations.	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of California Los Angeles AA 31084 Oakland AA 36084 San Francisco AA 41884	Full Scope Full Scope Full Scope	Entire MSA Entire MSA Entire MSA
State of New York New York AA 35644	Full Scope	Entire MSA

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS ICBC USA				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
ICBC USA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
CALIFORNIA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Low Satisfactory
NEW YORK	Low Satisfactory	Needs to Improve	Low Satisfactory	Low Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

State of California

Los Angeles AA

Demographic Information for Full Scope Area: Los Angeles AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,346	8.99	28.64	26.77	34.02	1.58
Population by Geography	9,818,605	8.01	29.43	28.26	33.92	0.39
Owner-Occupied Housing by Geography	1,552,091	2.13	16.61	28.64	52.61	0.01
Business by Geography	683,317	6.40	18.12	25.27	48.94	1.27
Farms by Geography	6,616	3.19	16.40	26.74	53.02	0.65
Family Distribution by Income Level	2,170,227	24.05	16.43	17.64	41.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	878,478	13.64	41.84	26.84	17.67	0.01
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		61,622 62,400 14%	Median Housing Value Unemployment Rate (2010 US Census)		526,439 4.39%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

The Los Angeles AA consists of Los Angeles County, California. The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies. According to 2010 Census data, there were 211 low-income and 672 moderate-income census tracts in the AA.

According to the 2010 U.S. Census, the total population of the AA was 9.82 million. The distribution of families by income level was 24.05 percent low-income, 16.43 percent moderate-income, 17.64 percent middle-income, and 41.88 percent upper-income. The percentage of families in the AA living below the poverty level is high at 14.14 percent. The 2010-weighted average of median family income for the AA was \$62,400. Low-income families in the AA earned median annual income of \$31,200 or less, and moderate-income families earned an annual income of \$31,200 to \$49,900.

In the Los Angeles AA, the bank provides retail and commercial banking services such as deposit-taking, lending, remittances, and settlement. The FDIC Deposit Market Share Report as of June 2016 shows there is strong competition for deposit and lending opportunities in the AA, with 108 total depository institutions. Competition includes large interstate banks, regional banks, savings banks, and community banks, as well as other banks that target the Sino-U.S. market customer. ICBC USA has five branches and five deposit-taking ATMs in the AA, which is low relative to the total in-market branches and offices of 1,782. As of June 30, 2016, ICBC USA's deposits in the AA totaled \$434.9 million, or 0.11 percent of the market. ICBC USA ranks 48th out of 108 depository institutions. The top five depository institutions together hold a 61.8

percent market share of the deposits within the AA. The top five depository institutions include Bank of America, N.A.; Wells Fargo, N.A.; JP Morgan Chase Bank, N.A.; MUFG Union Bank, N.A.; and Citibank, N.A.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in this AA declined during the evaluation period and is higher than the national average. The national unemployment rate declined during the evaluation period from 6.2 percent as of December 2014 to 4.9 percent as of December 2016. According to Moody's Analytics, the unemployment rate of the Los Angeles metropolitan area declined during the evaluation period from 8.2 percent in 2014 to 5.3 percent in 2016.

According to the BLS's June 2017 Metropolitan Area Employment and Unemployment Report, the third largest employment gains of all metropolitan areas occurred in the Los Angeles-Long Beach-Glendale, Calif metropolitan area from June 2016 to June 2017. Job gains were broadly based, but the primary drivers were technology, trade, healthcare, and construction. As of June 2017, the unemployment rate of the AA at 4.5 percent is slightly higher than the national unemployment rate of 4.4 percent.

According to Moody's Analytics, the AA has experienced two years of dynamic growth and is in the expansion stage of its business cycle. The primary economic industries are the high-tech, logistics, and tourism industries, and the AA benefits from global links to entertainment, tourism, and fashion. High housing and other living costs negatively affect the AA. The top five employers for this AA include University of California Los Angeles, Kaiser Permanente, University of Southern California, Northrop Grumman Corp., and Target Corp.

Housing

According to the 2010 U.S. Census, 45.31 percent of the total housing units in the AA were owner occupied, and 48.63 percent are rental occupied units. Additionally, low-income census tracts (CT) contained 2.13 percent of all owner-occupied units and moderate-income CTs contained 16.61 percent. The AA's low-income CTs contained 12.17 percent of renter-occupied units and moderate-income CTs contained 35.35 percent. The median housing value was \$526,439, and the median monthly gross rent was \$1,157. Homeowners and renters with home-related costs that exceeded 30 percent of their income totaled 20.74 and 26.33 percent, respectively.

There are relatively limited opportunities for residential mortgage lending in the AA's LMI geographies due to the low number of units, low rate of owner occupancy, high housing costs, and high poverty rate. The number of housing units is much lower in LMI geographies than middle-and upper-income geographies.

Community Contact

There are numerous opportunities in the area to participate in CD activities. The area is served by multiple well-established CD entities, including CD corporations, CD financial institutions (CDFIs), nonprofit entities, and governmental and quasi-governmental organizations focused on

areas such as affordable housing, economic development, asset development, financial education, community services, and youth programs.

In order to better understand credit and CD needs in the area, OCC staff reviewed a number of existing community contacts completed during the review period with organizations that serve and/or operate within the AA. The organizations focused on areas such as affordable housing, community and economic development, and community services. Most contacts noted that there is a need for affordable housing for the LMI population. Other identified needs included access to financial literacy training focused on financial decision-making and budgeting skills and conducted in languages other than English for both immigrants and younger people. Contacts noted that banks often work with the same key contacts at the same organizations and expressed the need for CRA and CD bankers to expand their contacts. They also ask the banks to involve executive management in the community. Having executive managers who serve as board members for nonprofits adds to the nonprofits' financial skills toolbox. Contacts also expressed the need to involve more than just the CRA/CD officers in the community, but also marketing and branch personnel as well.

State of California

Oakland AA

Demographic Information for Limited Scope Area: Oakland AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	567	13.76	21.34	33.33	31.39	0.18
Population by Geography	2,559,296	12.53	20.80	34.45	32.23	0.00
Owner-Occupied Housing by Geography	549,084	5.73	15.64	36.39	42.23	0.00
Business by Geography	174,032	10.39	17.51	32.15	39.91	0.04
Farms by Geography	2,761	6.63	15.61	35.49	42.27	0.00
Family Distribution by Income Level	599,692	23.31	16.42	19.15	41.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	238,260	20.56	28.33	34.11	17.00	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		88,024 93,600 10%	Median Housing Value Unemployment Rate (2010 US Census)	551,319 4.29%		

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

The Oakland AA consists solely of the Alameda County, California. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2010 Census data, there were 78 low-income and 121 moderate-income census tracts in the AA, and the total population of the AA was 2.56 million. The distribution of families by income level was 23.31 percent low-income, 16.42 percent moderate-income, 19.15 percent middle-income, and 41.12 percent upper-income. The percentage of families in the AA living below the

poverty level is high at 9.64 percent. The 2010 adjusted median family income for the AA was \$93,600. Low-income families in the AA earned median annual income of \$46,800 or less, and moderate-income families earned an annual income of \$46,800 to \$74,880.

In the Oakland AA, the bank provides retail and commercial banking services such as deposit-taking, lending, remittances, and settlement. The FDIC Deposit Market Share Report as of June 2016 indicates strong competition for deposit and lending opportunities in the AA. Competition includes large interstate banks, regional banks, savings banks, and community banks, as well as other banks that target the Sino-US market customer.

In the County of Alameda, there are 42 total depository institutions. ICBC USA has one branch in Alameda County, and one deposit-taking ATM, which is low relative to the total in-market branches and offices of 280. As of June 30, 2016, ICBC USA's deposits in the County of Alameda totaled \$68.03 million, or 0.16 percent of the market. ICBC USA ranks 32nd out of 42 depository institutions. The top five depository institutions account for 73.43 percent of total deposits in the County of Alameda. The top five depository institutions include Wells Fargo Bank, N.A.; Bank of America, N.A.; JPMorgan Chase Bank, N.A.; Citibank, N.A.; and Fremont Bank.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in the AA was low during the evaluation period and remains lower than the national average. The national unemployment rate declined during the evaluation period from 6.2 percent as of December 2014 to 4.9 percent as of December 2016. According to Moody's Analytics, the unemployment rate for Oakland declined from 5.9 percent to 4.4 percent during the same period, and unemployment is well below the national average.

According to Moody's Analytics, Alameda County and Oakland experienced economic benefits from growth in the high tech, medical center, and federal government non-defense industries. The area is the location of top rated universities and laboratories and is in close proximity to the world's tech capital. While Oakland's relative costs of living and costs of business are also high, they are below those of neighboring San Francisco. This allows Oakland to benefit from companies leaving San Francisco looking for lower business costs. The top five employers for the Oakland area include University of California, Berkeley; Safeway Inc.; Kaiser Permanente; Chevron Corp; and Wells Fargo & Co.

Housing

According to the 2010 U.S. Census, 56.36 percent of the total housing units in the AA were owner occupied, and 36.03 percent are rental occupied units. Additionally, low-income CTs contained 5.73 percent of all owner occupied units and moderate-income CTs contained 15.64 percent. The AA's low-income CTs contained 20.39 percent of renter occupied units and moderate-income CTS contained 30.77 percent. The median housing value was \$551,319 and the median monthly gross rent was \$1,234. Homeowners and renters with home-related costs that exceeded 30 percent of their income totaled 24.65 and 18.15 percent, respectively.

There are relatively limited opportunities for residential mortgage lending in the AA's LMI geographies due to the low number of units, the low rate for owner occupancy, high cost of housing, and high poverty rate. The number of housing units is much lower in LMI geographies than middle-and upper-income geographies.

Community Contact

There are numerous opportunities in the area to participate in CD activities. The area is served by multiple well-established CD entities, including CD corporations, CD financial institutions (CDFIs), nonprofit entities, and governmental and quasi-governmental organizations focused on areas such as affordable housing, economic development, asset development and financial education, community services, and youth programs.

In order to better understand credit and CD needs in the area, OCC staff reviewed a number of existing community contacts completed during the review period with organizations that serve and/or operate within the AA. The organizations focused on areas such as affordable housing, community and economic development, and community services. Most contacts noted that there is a need for affordable rental housing. Other identified needs included increased small business lending, support for aspiring entrepreneurs, and access to financial literacy training in other languages for both refugees and small businesses. Identified needs included the need for lower dollar amounts of loans for small businesses and additional micro lending program funding. Contacts also noted that there is a need for increased support of smaller local CD projects and programs. Contacts noted that banks often work with the same key contacts at the same organizations and expressed the need for CRA and CD bankers to expand their contacts. They also ask the banks to involve more than just the CRA/CD officers in the community but also credit, sales, and branch personnel as well.

State of California

San Francisco AA

Demographic Information for Full Scope Area: San Francisco AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	355	11.27	16.62	37.18	33.52	1.41
Population by Geography	1,523,686	10.76	18.22	39.96	31.05	0.01
Owner-Occupied Housing by Geography	282,177	3.25	12.32	42.73	41.70	0.00
Business by Geography	143,621	18.14	11.17	31.42	39.17	0.10
Farms by Geography	1,538	8.00	14.50	35.70	41.74	0.07
Family Distribution by Income Level	322,846	23.72	16.23	18.15	41.91	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	128,967	16.13	26.23	39.56	18.08	0.01
Median Family Income		93,987	Median Housing Value	769,464		
FFIEC Adjusted Median Family Income for 2016		104,700	Unemployment Rate (2010 US Census)	3.89%		
Households Below Poverty Level		9.40%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 US Census and 2016 FFIEC updated MFI

The San Francisco AA consists of the counties of San Francisco and San Mateo. The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies. According to 2010 Census data, there were 40 low-income and 59 moderate-income census tracts in the AA.

According to the 2010 U.S. Census, the total population of the AA was 1.52 million. The distribution of families by income level was 23.72 percent low-income, 16.23 percent moderate-income, 18.15 percent middle-income, and 41.91 percent upper-income. The percentage of families in the AA living below the poverty level is moderate at 5.84 percent. The 2010 adjusted median family income for the AA was \$104,700. Low-income families in the AA earned median annual income of \$52,350 or less, and moderate-income families earned an annual income of \$52,350 to \$83,760.

In the San Francisco AA, the bank provides retail and commercial banking services such as deposit-taking, lending, remittances, and settlement. The FDIC Deposit Market Share Report as of June 2016 shows there is strong competition for deposit and lending opportunities in the AA. Competition includes large interstate banks, regional banks, savings banks, and community banks as well as other banks that target the Sino-US market customer. In the Counties of San Francisco and San Mateo, there are 51 total depository institutions. ICBC USA has four branches in the AA and two deposit-taking ATMs, which is low relative to the total in-market branches and offices of 444. As of June 30, 2016, ICBC USA's deposits in the Counties of San Francisco and San Mateo totaled \$352.9 million, which is 0.15 percent of the market. ICBC USA ranks 21st of 51 depository institutions. The top five depository institutions account for 81.31 percent of total deposits in the Counties of San Francisco and San Mateo. The top five depository institutions include Bank of America, N.A.; Wells Fargo Bank, N.A.; First Republic Bank; Bank of America California, N.A.; and Citibank, N.A.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in the AA was low during the evaluation period, and remains lower than the national average. The national unemployment rate declined during the evaluation period from 6.2 percent as of December 2014 to 4.9 percent as of December 2016. According to Moody's Analytics, the unemployment rate for San Francisco declined from 4.3 percent in 2014 to 3.2 percent in 2016, well below the national averages.

According to Moody's Analytics, San Francisco benefits from a well-educated and highly skilled workforce earning very high incomes. Technology has been a significant contributor to the robust expansion and the primary driver of the low unemployment rates. San Francisco also benefits from the financial center and medical center industries. The accelerated growth in San Francisco also drove up the relative costs of living and costs of doing business to among the highest in the country. The top five employers for the San Francisco area include University of California San Francisco, Stanford University, University of San Francisco, Genetech, Inc., and California Pacific Medical Center.

Housing

According to the 2010 U.S. Census, 43.91 percent of the total housing units in the AA were owner occupied, and 48.17 percent are rental occupied units. Additionally, low-income CTs contained 3.25 percent of all owner occupied units and moderate-income CTs contained 12.32 percent. The AA's low-income CTs contained 19.94 percent of renter occupied units and moderate-income CTS contained 17.39 percent. The median housing value was \$794,296 and the median monthly gross rent was \$1,378. Homeowners and renters with home-related costs that exceeded 30 percent of their income totaled 17.83 and 20.94 percent of total housing units, respectively.

There are relatively limited opportunities for residential mortgage lending in the AA's LMI geographies due to the low number of units, the low rate for owner occupancy, and high poverty

rate. The number of housing units is much lower in LMI geographies than middle-and upper-income geographies.

Community Contact

There are numerous opportunities in the area to participate in CD activities. The area is served by multiple well-established CD entities, including CD corporations, community development financial institutions (CDFIs), nonprofit entities, and governmental and quasi-governmental organizations focused on areas such as affordable housing, economic development, asset development and financial education, community services, and youth programs.

In order to better understand credit and CD needs in the area, OCC staff reviewed a number of existing community contacts completed during the review period with organizations that serve and/or operate within the AA. The organizations focused on areas such as affordable housing, community and economic development, and community services. Most contacts noted that there is a need for affordable rental housing. Other identified needs included increased small business lending and support for aspiring entrepreneurs, and access to financial literacy training in other languages for both refugees and small businesses. Identified needs included the need for lower dollar amounts of loans for small businesses and additional micro-lending program funding. Contacts also noted that there is a need for increased support of smaller local CD projects and programs. Contacts noted that banks often work with the same key contacts at the same organizations and expressed the need for CRA and CD bankers to expand their contacts. They also ask the banks to involve more than just the CRA/CD officers in the community but also credit, sales, and branch personnel as well.

State of New York

New York AA

Demographic Information for Full Scope Area: New York AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,718	11.06	30.56	32.13	23.28	2.97
Population by Geography	6,321,295	13.67	34.30	27.76	24.19	0.09
Owner-Occupied Housing by Geography	793,344	3.76	21.72	35.86	38.65	0.00
Business by Geography	429,131	8.46	22.33	22.49	43.13	3.60
Farms by Geography	1,910	5.13	20.58	26.44	46.34	1.52
Family Distribution by Income Level	1,409,002	30.09	17.15	16.65	36.11	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	665,646	22.27	43.83	24.64	9.25	0.00
Median Family Income		68,006	Median Housing Value	571,093		
FFIEC Adjusted Median Family Income for 2016		72,600	Unemployment Rate (2010 US Census)	4.30%		
Households Below Poverty Level		17%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

The New York AA consists of Kings, New York, and Queens Counties. The AA meets the requirement of the regulation and does not arbitrarily exclude LMI geographies. According to 2010 Census data, there were 190 low-income census tracts and 525 moderate-income tracts in the AA.

According to the 2010 U.S. Census, the total population of the AA was 6.32 million. The distribution of families by income level was 30.09 percent low-income, 17.15 percent moderate-income, 16.65 percent middle-income, and 36.11 percent upper-income. The percentage of families in the AA living below the poverty level is high at 14.78 percent. The 2010-weighted average median family income for the AA was \$72,600. Low-income families in the AA earned median annual income of \$36,300 or less, and moderate-income families earned an annual income of \$36,300 to \$58,080.

In the New York AA, the bank provides retail and commercial banking services such as deposit-taking, lending, remittances, and settlement. The FDIC Deposit Market Share Report as of June 2016 shows there is strong competition for deposit and lending opportunities in the AA, with 107

total depository institutions and 1,497 total offices in market. Competition includes large interstate banks, regional banks, savings banks, and community banks as well as other banks that target the Sino-US market customer. ICBC USA has three branches in this AA, and three deposit-taking ATMs in this AA. As of June 30, 2016, ICBC USA's deposits in the AA totaled \$767.8 million, which is 0.07 percent of the market. ICBC USA ranks 47th of 107 depository institutions. The top five depository institutions account for 75.97 percent of total deposits in the AA. The top five depository institutions include JPMorgan Chase Bank, N.A., The Bank of New York Mellon, HSBC Bank USA, N.A., Citibank, N.A., and Bank of America, N.A. In addition to FDIC-insured institutions, a number of credit unions, mortgage lenders and brokers, and money service businesses serve this area.

Employment and Economic Factors

New York City, the principal city in the MMA is the single largest regional urban economy in the country. New York City is the hub for banking, finance, and communication in the United States. New York is also a major manufacturing center and shipping port, and it has a thriving technology sector. According to Moody's Analytics, New York is in a continued period of expansion, despite continued high relative costs of living. Costs of doing business also remain high, especially office rents and energy costs. The top three industries in the AA are financial centers, medical centers, and tourism. The five largest employers in the AA are JP Morgan Chase and Co.; Mount Sinai Medical Center; Macy's, Inc.; Citibank, N.A.; and New York-Presbyterian Medical Center. New York is recognized as the financial capital of the world and benefits from high per capita incomes and strong international immigration.

According to the Bureau of Labor Statistics, unemployment in this AA declined during the evaluation period but remains above the national average. The national unemployment rate declined during the evaluation period from 6.2 percent as of December 2014 to 4.9 percent as of December 2016. According to Moody's Analytics, the unemployment rate for the New York City metropolitan area declined during the evaluation period from 6.7 percent in 2014 to 5.0 percent in 2016. According to the Bureau of Labor Statistics Metropolitan Area Employment and Unemployment Report as of June 2017, the New York-Newark-Jersey City, N.Y.-N.J.-P.A. metropolitan area benefitted from the largest employment gains of all metropolitan areas during the period from June 2016 to June 2017. Unemployment rates in the AA decreased as of June 2017 to 4.3 percent and are on par with the national unemployment rate of 4.4 percent.

Housing

The cost of living in the area is high and affects borrowing ability. Housing affordability is a significant issue. According to the 2010 U.S. Census, 29.85 percent of the total housing units in the AA were owner occupied, and 60.84 percent are rental occupied units. Additionally, low-income CTs contained 3.76 percent of all owner occupied units and moderate-income CTs contained 21.72 percent. The AA's low-income CTs contained 16.28 percent of renter occupied units and moderate-income CTs contained 36.37 percent. The median housing value was \$541,823 and the median monthly gross rent was \$1,175. Homeowners and renters with home-related costs that exceeded 30.00 percent of their income totaled 12.03 and 29.22 percent of total housing units, respectively.

There are relatively limited opportunities for residential mortgage lending in the AA's LMI geographies due to the low number of units, the low rate for owner occupancy, and high poverty rate. The number of housing units is much lower in LMI geographies than middle-and upper-income geographies.

Community Contact

There are numerous opportunities in the area to participate in CD activities. The area is served by multiple well-established CD entities, including CD corporations, CD financial institutions (CDFIs), nonprofit entities, and governmental and quasi-governmental organizations focused on areas such as affordable housing, economic development, asset development and financial education, community services, and youth programs.

In order to better understand credit and CD needs in the area, OCC staff reviewed a number of existing community contacts completed during the review period with organizations that serve and/or operate within the AA. The organizations focused on areas such as affordable housing, community and economic development, and community services. Contacts noted that there are pockets of poverty in many neighborhoods and communities throughout the AA and that in some areas the poverty level is understated. Two of the biggest costs for people residing in the community are housing and childcare. Most contacts noted that there is a need for affordable rental housing. Other identified needs included financial support in the form of grants and low-interest loans for non-profit organizations serving low-income households and communities, as many organizations are seeing increased demand for their services; increased small business lending and support for aspiring entrepreneurs; and access to financial literacy training in other languages. Contacts also noted that there is a need for increased support of smaller local CD projects and programs.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank

in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area. *This table is not included because ICBC USA did not extend any loans to farms during the evaluation period. Farm lending is not a primary product for the institution.*
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the

percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available. *This table is not included because ICBC USA did not extend any small loans to farms during the evaluation period. Farm lending is not a primary product for this institution.*

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area. *This table is not included because consumer loans are not a primary product for this institution.*

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

State of California

Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 1. Lending Volume

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Los Angeles AA	32.18	26	49,500	2	850	0	0	0	0	28	50,350	50.81
Oakland AA	26.44	22	14,752	1	800	0	0	0	0	23	15,552	7.95
San Francisco AA	41.38	36	30,262	0	0	0	0	0	0	36	30,262	41.24

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2016		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31,					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Los Angeles AA	14	23.33	2.13	0.00	16.61	7.14	28.65	35.71	52.61	57.14	0.00	0.00	0.00	0.00	0.00	
Oakland AA	6	10.00	5.73	0.00	15.64	16.67	36.39	16.67	42.23	66.67	0.00	0.00	0.00	0.00	0.00	
San Francisco AA	17	28.33	3.25	0.00	12.32	0.00	42.73	29.41	41.70	70.59	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Los Angeles AA	0	0.00	2.13	0.00	16.61	0.00	28.65	0.00	52.61	0.00	0.00	0.00	0.00	0.00	0.00	
Oakland AA	0	0.00	5.73	0.00	15.64	0.00	36.39	0.00	42.23	0.00	0.00	0.00	0.00	0.00	0.00	
San Francisco AA	1	100.00	3.25	0.00	12.32	0.00	42.73	100.00	41.70	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2016			Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Los Angeles AA	6	25.00	2.13	0.00	16.61	33.33	28.65	16.67	52.61	50.00	0.00	0.00	0.00	0.00	0.00
Oakland AA	10	29.41	5.73	20.00	15.64	40.00	36.39	20.00	42.23	20.00	0.00	0.00	0.00	0.00	0.00
San Francisco AA	8	33.33	3.25	0.00	12.32	25.00	42.73	25.00	41.70	50.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Los Angeles AA	6	27.27	13.18	0.00	31.63	33.33	24.71	50.00	30.48	16.67	0.00	0.00	0.00	0.00	0.00
Oakland AA	6	27.27	19.71	16.67	31.65	66.67	34.25	0.00	14.38	16.67	0.00	0.00	0.00	0.00	0.00
San Francisco AA	10	45.45	26.82	20.00	12.92	30.00	29.46	30.00	30.79	20.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles AA	2	66.67	6.40	0.00	18.12	100.00	25.27	0.00	48.94	0.00	0.00	0.00	0.00	0.00	0.00
Oakland AA	1	33.33	10.39	0.00	17.51	100.00	32.15	0.00	39.91	0.00	0.00	0.00	0.00	0.00	0.00
San Francisco AA	0	0.00	18.14	0.00	11.17	0.00	31.42	0.00	39.17	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet.

Table 7. Geographic Distribution of Small Loans to Farms

Not applicable. ICBC USA did not extend any small loans to farms during the evaluation period. Farm lending is not a primary product for this institution.

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Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans**	% Families ¹	% BANK Loans*	% Families***	% BANK Loans**	% Families**	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:															
Los Angeles AA	14	37.84	24.05	8.33	16.43	8.33	17.64	8.33	41.88	75.00	0.00	0.00	0.00	0.00	0.00
Oakland AA	6	16.22	23.31	50.00	16.42	0.00	19.15	0.00	41.12	50.00	0.00	0.00	0.00	0.00	0.00
San Francisco AA	17	45.95	23.72	16.67	16.23	0.00	18.15	16.67	41.91	66.67	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 46.7% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [†]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ²	% BANK Loans ^{***} *	% Families ^{***}	% BANK Loans ^{***} *	% Families ^{***}	% BANK Loans ^{***} *	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles AA	0	0.00	24.05	0.00	16.43	0.00	17.64	0.00	41.88	0.00	0.00	0.00	0.00	0.00	0.00
Oakland AA	0	0.00	23.31	0.00	16.42	0.00	19.15	0.00	41.12	0.00	0.00	0.00	0.00	0.00	0.00
San Francisco AA	1	100.00	23.72	0.00	16.23	0.00	18.15	0.00	41.91	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

2 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 2016		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31,							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans*** *	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Los Angeles AA	6	25.00	24.05	0.00	16.43	0.00	17.64	25.00	41.88	75.00	0.00	0.00	0.00	0.00	0.00
Oakland AA	10	41.67	23.31	12.50	16.42	37.50	19.15	25.00	41.12	25.00	0.00	0.00	0.00	0.00	0.00
San Francisco AA	8	33.33	23.72	0.00	16.23	0.00	18.15	60.00	41.91	40.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 50.0% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 2016		Geography: CALIFORNIA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Los Angeles AA	2	66.67	87.05	50.00	0.00	50.00	50.00	0.00	0.00
Oakland AA	1	33.33	85.45	100.00	0.00	0.00	100.00	0.00	0.00
San Francisco AA	0	0.00	85.19	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Not applicable. ICBC USA did not extend any small loans to farms during the evaluation period. Farm lending is not a primary product for this institution.

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Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Not applicable. This table is not included because consumer loans are not a primary product for this institution.

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Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: NOVEMBER 13, 2013 TO AUGUST 21, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Los Angeles AA	0	0	24	859	24	859	53.72	0	0
Oakland AA	0	0	5	718	5	718	44.90	0	0
San Francisco AA	0	0	19	22	19	22	1.38	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: ICBC		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population								
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
Full Review:																						
Los Angeles AA	50.81	5	50.00	0.00	40.00	0.00	60.00	0	0	0	0	0	0	8.01	29.43	28.26	33.92					
Oakland AA	7.95	1	10.00	100.00	0.00	0.00	0.00	0	0	0	0	0	0	12.53	20.80	34.45	32.23					
San Francisco AA	41.24	4	40.00	75.00	0.00	25.00	0.00	0	0	0	0	0	0	10.76	18.22	39.96	31.05					

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Los Angeles AA	50.81	5	50.00	0.00	40.00	0.00	60.00	5	45.45	0	2	0	3	8.01	29.43	28.26	33.92
Oakland AA	7.95	1	10.00	100.00	0.00	0.00	0.00	1	9.09	1	0	0	0	12.53	20.80	34.45	32.23
San Francisco AA	41.24	4	40.00	75.00	0.00	25.00	0.00	2	18.18	2	0	0	0	10.76	18.22	39.96	31.05

State of New York

Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
New York AA	100.00	51	52,955	2	1,630	0	0	0	0	53	54,585	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from November 10, 2013 to August 21, 2017.

*** Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
New York AA	23	100.00	3.76	21.74	21.72	21.74	35.86	39.13	38.66	1	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
New York AA	1	100.00	3.76	0.00	21.72	100.00	35.86	0.00	38.66	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 2016		Geography: NEW YORK								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31,					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
New York AA	10	100.00	3.76	30.00	21.72	40.00	35.86	20.00	38.66	10.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
New York AA	17	100.00	14.81	29.41	30.84	47.06	18.12	23.53	36.23	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *									
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
New York AA	2	100.00	8.46	0.00	22.33	50.00	22.49	50.00	43.13	0.00	0.00	0.00	0.00	0.00	0.00					

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet .

Table 7. Geographic Distribution of Small Loans to Farms

Not applicable. ICBC USA did not extend any small loans to farms during the evaluation period. Farm lending is not a primary product for this institution.

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁴	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York AA	23	100.00	30.09	0.00	17.15	0.00	16.65	41.67	36.11	58.33	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR
 ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
 *** Percentage of Families is based on the 2010 Census information.
 **** As a percentage of loans with borrower income information available. No information was available for 46.7% of loans originated and purchased by bank.
 4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW YORK								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ⁵				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ⁵	% BANK Loans ^{***}	% Families ^{***}	% BANK Loans [*]	% Families ^{***}	% BANK Loans [*]	Overall	Low	Mod	Mid	Upp
Full Review:															
New York AA	1	100.00	30.09	0.00	17.15	0.00	16.65	0.00	36.11	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 2016		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31,							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁶	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans***	Overa ll	Low	Mod	Mid	Upp
Full Review:															
New York AA	10	100.0 0	30.09	0.00	17.15	0.00	16.65	0.00	36.11	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 50.0% of loans originated and purchased by bank.

⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 2016		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
New York AA	2	100.00	85.22	100.00	0.00	0.00	100.00	0.00	0.00

* Based on 2015 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Not applicable. ICBC USA did not extend any small loans to farms during the evaluation period. Farm lending is not a primary product for this institution.

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Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Not applicable. This table is not included because consumer loans are not a primary product for this institution.

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Institution ID: Industrial and Commercial Bank of China (USA), N.A.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW YORK				Evaluation Period: NOVEMBER 13, 2013 TO AUGUST 21, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New York AA	0	0	20	48	20	48	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: ICBC				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
New York AA	100.00	3	100.00	66.67	33.33	0.00	0.00	0	0	0	0	0	0	13.67	34.30	27.76	24.19							

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New York AA	100.00	3	100.00	66.67	33.33	0.00	0.00	3	27.27	2	0	0	1	13.67	34.30	27.76	24.19